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Attorneys for Defendant Allison Marie Baver

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALLISON MARIE BAVER

Defendant.

**Notice of Explanation and Certification to
the Court**

Case No. 2:21-cr-00520

District Judge Jill N. Parrish

Magistrate Judge Cecilia Romero

Ms. Baver's Rule 33 motion deadline is today. Counsel certifies that the motion was finalized on July 14, 2025¹. Due to a fundamental disagreement, counsel filed a motion to withdraw today. Filing the Rule 33 motion now could lead to ineffective assistance claims and prevent Ms. Baver, or new counsel, from amending it. Counsel faces a dilemma: not filing violates the Court's order, while filing could disadvantage Ms. Baver. Counsel believes he must

¹ Counsel has saved a PDF copy should the Court require a copy.

withhold filing until the withdrawal motion is resolved. This is the only way counsel can uphold his duty to Ms. Baver.

RESPECTFULLY SUBMITTED this July 22, 2025.

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/s/ Nicolas C. Wilde
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